

AUG 28 2023

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

DT
DEPUTY CLERK

UNITED STATES OF AMERICA)	UNDER SEAL
)	NO. <u>3:23-cr-00127</u>
v.)	
)	18 U.S.C. § 371
)	18 U.S.C. § 922(a)(1)(A)
[1] ARNOLD JUNIOR MARKS)	18 U.S.C. § 922(g)(1)
a/k/a "AJ")	18 U.S.C. § 922(o)
)	18 U.S.C. § 923(a)
[2] KAMAL FAKHRY)	18 U.S.C. § 924
)	18 U.S.C. § 933
[3] CASSETTY CARVER)	26 U.S.C. § 5841
)	26 U.S.C. § 5861
[4] MYKYTA STRUKOV)	26 U.S.C. § 5871

I N D I C T M E N T

COUNT ONE

(Weapons Trafficking Conspiracy—18 U.S.C. § 933)

THE GRAND JURY CHARGES:

1. Beginning not later than in or about April 2023, the exact date being unknown to the Grand Jury, and continuing through at least on or about August 9, 2023, in the Middle District of Tennessee and elsewhere, the defendants **[1] ARNOLD JUNIOR MARKS, a/k/a "AJ," [2] KAMAL FAKHRY, [3] CASSETTY CARVER, and [4] MYKYTA STRUKOV**, together with others both known and unknown to the Grand Jury, did knowingly: (a) ship, transport, transfer, cause to be transported, and otherwise dispose of one or more firearms to another person, in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony; and (b) receive from another person one or more firearms, in and affecting interstate or foreign commerce,

knowing or having reasonable cause to believe that such receipt would constitute a felony, as defined in section 932(a), and did attempt to and conspire to do the same.

In violation of Title 18, United States Code, Sections 933(a) and (b).

COUNT TWO

(Conspiracy to Commit Offenses Against the United States—18 U.S.C. § 371)

THE GRAND JURY FURTHER CHARGES:

Purpose of the Conspiracy

2. Beginning not later than in or about April 2023, the exact date being unknown to the Grand Jury, and continuing through at least on or about August 9, 2023, in the Middle District of Tennessee and elsewhere, the defendants **[1] ARNOLD JUNIOR MARKS, a/k/a “AJ,” [2] KAMAL FAKHRY, [3] CASSETTY CARVER, and [4] MYKYTA STRUKOV**, did knowingly combine, conspire, confederate, and agree with each other and others known and unknown to the Grand Jury, to commit certain offenses against the United States, that is, including, but not limited to:

- a) knowingly engaging in the business of dealing in firearms without a license, in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 923;
- b) possession of a firearm in and affecting interstate or foreign commerce, by a person previously convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(g)(1);
- c) transfer and possession of a machinegun, in violation of Title 18, United States Code, Section 922(o); and
- d) the transportation, transfer, and disposal of firearms to another person in and affecting interstate or foreign commerce knowing or having reasonable cause to

believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, as defined in Title 18, United States Code, Section 932(a), in violation of Title 18, United States Code, Section 933.

3. By engaging in the business of dealing firearms without a license, [1] **ARNOLD JUNIOR MARKS**, a/k/a “AJ,” [2] **KAMAL FAKHRY**, [3] **CASSETTY CARVER**, and [4] **MYKYTA STRUKOV**, were able to conceal the nature of their firearms transactions from federal authorities because these transactions were not recorded and subject to inspection and audit.

4. Furthermore, [1] **ARNOLD JUNIOR MARKS**, a/k/a “AJ,” [2] **KAMAL FAKHRY**, [3] **CASSETTY CARVER**, and [4] **MYKYTA STRUKOV**, were able to profit and enrich themselves and each other from the unrecorded transactions.

Manner and Means

5. It was part of the conspiracy that [1] **ARNOLD JUNIOR MARKS**, a/k/a “AJ,” [2] **KAMAL FAKHRY**, [3] **CASSETTY CARVER**, and [4] **MYKYTA STRUKOV**, and other individuals known and unknown to the Grand Jury, would purchase firearms with the intent of reselling firearms to [REDACTED] ndividuals.

6. It was further part of the conspiracy that [1] **ARNOLD JUNIOR MARKS**, a/k/a “AJ,” [2] **KAMAL FAKHRY**, [3] **CASSETTY CARVER**, and [4] **MYKYTA STRUKOV**, and other individuals known and unknown to the Grand Jury, offered to sell firearms to individuals in the Middle District of Tennessee.

7. It was further part of the conspiracy that that [1] **ARNOLD JUNIOR MARKS**, a/k/a “AJ,” [2] **KAMAL FAKHRY**, [3] **CASSETTY CARVER**, and [4] **MYKYTA STRUKOV**, and other individuals known and unknown to the Grand Jury, none of whom had a

license to sell firearms, would then sell these firearms to individuals, some of whom were felons, within the Middle District of Tennessee.

Overt Acts

8. In furtherance of the conspiracy, and to accomplish the object and purpose of the conspiracy, at least one co-conspirator committed and caused to be committed, various acts in the Middle District of Tennessee and elsewhere, including, but not limited to, the following:

- A. On or about April 29, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” communicated with [REDACTED] via text message and offered to sell [REDACTED] a Glock 19 pistol for \$650;
- B. On or about April 30, 2023, and on or about May 1, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” spoke with [REDACTED] via text messages to coordinate a firearms transaction between [REDACTED] I and [1] ARNOLD JUNIOR MARKS, a/k/a “AJ”;
- C. On or about April 30, 2023, and on or about May 1, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” offered to sell [REDACTED] an “SKS” style rifle for \$650 and a “Hellcat 9mm” for \$850;
- D. On or about April 30, 2023, and on or about May 1, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” indicated that he currently possessed more firearms, and his source of firearms could acquire additional firearms;
- E. On or about May 2, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” knew [REDACTED] was previously convicted of a felony offense and prohibited from possessing a firearm. Although [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” knew [REDACTED] was prohibited from possessing a firearm, [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” sold [REDACTED] a Taurus model G2 Millennium 9mm pistol bearing serial number ABG732163,

which was loaded with 9 rounds of ammunition;

F. On or about May 12, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" and [REDACTED] discussed the sale of firearms and where they could meet so [REDACTED] could provide [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" with \$3,150 for firearms;

G. On or about May 12, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" explained to [REDACTED] that [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" could take [REDACTED]'s money and purchase firearms from his "plug" in Woodbine;

H. On or about May 14, 2023, and on or about May 15, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" offered to sell numerous firearms to [REDACTED]

I. On or about May 15, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" offered to sell [REDACTED] two (2) Glock 9mm pistols for \$800 per pistol;

J. On or about May 15, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" sold [REDACTED] two (2) Glock 9mm pistols for \$1,600;

K. On or about May 15, 2023, [REDACTED] paid [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" \$150 for the firearm [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" provided [REDACTED] on May 2, 2023;

L. On or about May 30, 2023, and on or about May 31, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" offered to sell [REDACTED] numerous firearms;

M. On or about June 1, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" retrieved firearms from a residence to sell to [REDACTED];

N. On or about June 1, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" sold [REDACTED] an FN Herstal model Five-Severn 5.7x28mm caliber pistol, a Canik model TP-9 Elite SC 9mm caliber pistol, and a Nornico model SKS rifle for \$3,000;

O. On or about June 4, 2023, and on or about June 5, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" offered to sell [REDACTED] numerous firearms;

P. On or about June 4, 2023, and on or about June 5, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" explained to [REDACTED] that he obtained firearms from a source of supply or "plug" in the Woodbine neighborhood of South Nashville to sell [REDACTED] numerous firearms;

Q. On or about June 5, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" informed [REDACTED] that he possessed and would sell [REDACTED] a FX-9 pistol for \$1,700, a Springfield Armory XD pistol for \$850, and also an AR-10 rifle for \$2,000 that was being delivered to "the plug's house" in Woodbine;

R. On or about June 5, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" sold [REDACTED] a Freedom Ordnance model FX-9 9mm caliber pistol for \$1,500;

S. On or about June 5, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" met with the "Woodbine plug," later identified as [2] KAMAL FAKHRY, at the Rains Market & Eatery, which is located at 106 Rains Avenue in Nashville, Tennessee;

T. On or about June 5, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" sold [REDACTED] a Diamondback Arms Inc. model DB10 7.62x51mm rifle for \$2,000;

U. On or about June 12, 2023, and on or about June 13, 2023, [1] ARNOLD JUNIOR MARKS a/k/a "AJ" offered to sell [REDACTED] numerous firearms;

V. On or about June 13, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" explained to [REDACTED] that he was coordinating the purchase of additional firearms from a source of supply or "plug" in the Woodbine neighborhood of South Nashville to sell [REDACTED]

W. On or about June 13, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" sold [REDACTED] a Canik model TP9 SF Elite 9x19mm pistol and a Springfield Armory model XD-40 Sub-Compact .40 caliber pistol for \$1,500;

X. On or about June 15, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" offered to sell [REDACTED] numerous firearms;

Y. On or about June 15, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" informed [REDACTED] that he obtained a Glock model 48 pistol and an Anderson Manufacturing rifle from the "Woodbine Plug" to sell [REDACTED]

Z. On or about June 15, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" told [REDACTED] that the "Glock switch" was at the residence of two other individuals known to the Grand Jury as Individual 1 and Individual 2;

AA. On or about June 22, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" told [REDACTED] that he was retrieving the "Glock switch" from the residence of two other individuals known to the Grand Jury as Individual 1 and Individual 2;

BB. On or about June 22, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" sold [REDACTED] a Glock model 48 9x19 caliber pistol, an Anderson Manufacturing model AM-15 350 LEGEND caliber rifle, eighty (80) rounds of Winchester 350 Legend caliber ammunition, and a machine gun conversion kit commonly referred to as a "Glock switch" for \$3,700;

CC. On or about June 22, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" showed [REDACTED] how to install and remove a Glock switch from a firearm and [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" and [3] CASSETTY CARVER cleaned the ammunition provided to [REDACTED] in order to remove [1] ARNOLD JUNIOR MARKS' fingerprints from

the ammunition;

DD. On or about June 22, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" met with [2] KAMAL FAKHRY, [4] MYKYTA STRUKOV, and an unindicted co-conspirator to obtain additional firearms to sell to [REDACTED]

EE. On or about June 22, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" sold [REDACTED] a Masterpiece Arms model MPA 930DMG 9mm caliber pistol that was modified for automatic fire, a Rock Island Armory model M19110A1 FS .45 caliber pistol, a Ruger model RUGER-57 5.7x28mm pistol, and an American Tactical model Omni Hybrid multi-caliber pistol for \$4,400;

FF. On or about June 22, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" "fronted" [REDACTED] \$1,200 of the purchase price and directed [REDACTED] to repay the \$1,200 to [3] CASSETTY CARVER;

GG. On or about July 6, 2023, and July 7, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" offered to sell [REDACTED] numerous firearms that [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" would obtain from his "Woodbine plug," who law enforcement understand to be [4] KAMAL FAKHRY;

HH. On or about July 7, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" directed [REDACTED] to meet him at an auto parts store;

II. On or about July 7, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" met with [4] KAMAL FAKHRY at the Rains Market & Eatery in Nashville where [4] KAMAL FAKHRY provided a bag containing firearms to [1] ARNOLD JUNIOR MARKS, a/k/a "AJ";

JJ. On or about July 7, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ"

sold [REDACTED] a Glock GMBH model 26 9x19mm pistol, a Glock GMBH model 48 9x19mm pistol, a Walther model P22 .22 LR caliber pistol, and a Smith & Wesson model 642-2 “Lady Smith” .38 S&W SPL +P caliber revolver for \$2,350;

KK. On or about July 10, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” communicated with [REDACTED] regarding a proposed sale of a “Draco” pistol for \$1,800;

LL. On or about July 10, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” met with [4] KAMAL FAKHRY and [4] MYKYTA STRUKOV at the Rains Market & Eatery in Nashville before [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” obtained the money from [REDACTED] to purchase firearms;

MM. On or about July 10, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” met with [REDACTED] and [REDACTED] provided [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” with \$8,450 for firearms;

NN. On or about July 10, 2023, immediately after obtaining money from [REDACTED], [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” met with [4] MYKYTA STRUKOV at the Rains Market & Eatery in Nashville where [4] MYKYTA STRUKOV provided [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” with three bags containing firearms in exchange for the currency previously obtained from [REDACTED]

OO. On or about July 10, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a “AJ” sold [REDACTED] a Zastava model ZPAP92 7.62x39mm pistol, a Spikes Tactical model ST-15 5.56 caliber rifle, a Kimber model Stainless II .45 caliber pistol, a FN Herstal model Five-Seven 5.7x28mm pistol, and a HS Produkt Springfield Arms model XD-40 SUBCOMPACT .40 caliber pistol;

PP. On or about July 18, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a “AJ”

sent [REDACTED] numerous text messages in an effort to sell [REDACTED] additional firearms;

QQ. On or about August 4, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" sent [REDACTED] numerous text messages in an effort to sell [REDACTED] additional firearms that were in the possession of an individual known to the Grand Jury as Individual;

RR. On or about August 4, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" sent [REDACTED] two photographs that were in the possession of an individual known to the Grand Jury as Individual 1 that [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" wanted to sell to [REDACTED] and

SS. On or about August 9, 2023, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ" sold [REDACTED] a Smith & Wesson model Airweight .38 S&W SPL +P revolver, a Taurus model PT140 G2 Millennium .40 caliber pistol, a Springfield Armory HS Produkt model XDM Elite 9x19mm caliber pistol, a Glock GMBH model 30 .45 caliber pistol, a Glock model 19X 9x19mm caliber pistol, a Romarm/Cugir model Micro Draco 7.62x39mm caliber pistol, a Zastava Arms model MDL ZPAP92 7.62x39mm pistol, and an American Tactical model Omni Hybrid 5.56 caliber pistol for \$9,000.

All in violation of Title 18, United States Code, Section 371.

COUNT THREE

(Possession of a Firearm By a Previously Convicted Felon —18 U.S.C. § 922(g)(1))

THE GRAND JURY FURTHER CHARGES:

9. On or about May 2, 2023, in the Middle District of Tennessee, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ," knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce,

a firearm, to wit: a Taurus model G2 Millennium 9mm pistol.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT FOUR

(Possession of a Firearm By a Previously Convicted Felon —18 U.S.C. § 922(g)(1))

THE GRAND JURY FURTHER CHARGES:

10. On or about May 15, 2023, in the Middle District of Tennessee, **[1] ARNOLD JUNIOR MARKS, a/k/a “AJ,”** knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, a firearm, to wit: a Glock model 19 Gen 5 9x19 pistol and a Glock model 19X 9x19 pistol.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT FIVE

(Possession of a Firearm By a Previously Convicted Felon —18 U.S.C. § 922(g)(1))

THE GRAND JURY FURTHER CHARGES:

11. On or about June 1, 2023, in the Middle District of Tennessee, **[1] ARNOLD JUNIOR MARKS, a/k/a “AJ,”** knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, a firearm, to wit: a FN Herstal model Five-Seven 5.7x28mm caliber pistol, a Canik model TP-9 Elite SC 9mm caliber pistol, and a Nornico model SKS rifle.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT SIX

(Possession of a Firearm By a Previously Convicted Felon —18 U.S.C. § 922(g)(1))

THE GRAND JURY FURTHER CHARGES:

12. On or about June 5, 2023, in the Middle District of Tennessee, **[1] ARNOLD JUNIOR MARKS, a/k/a “AJ,”** knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, a firearm, to wit: a Diamondback Arms Inc. model DB10 7.62x51mm rifle and a Freedom Ordnance model FX-9 9mm caliber pistol.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT SEVEN

(Possession of a Firearm By a Previously Convicted Felon —18 U.S.C. § 922(g)(1))

THE GRAND JURY FURTHER CHARGES:

13. On or about June 13, 2023, in the Middle District of Tennessee, **[1] ARNOLD JUNIOR MARKS, a/k/a “AJ,”** knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, a firearm, to wit: a Canik model TP9 SF Elite 9x19mm pistol and a Springfield Armory model XD-40 Sub-Compact .40 caliber pistol.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT EIGHT

(Possession of a Firearm By a Previously Convicted Felon —18 U.S.C. § 922(g)(1))

THE GRAND JURY FURTHER CHARGES:

14. On or about June 22, 2023, in the Middle District of Tennessee, **[1] ARNOLD JUNIOR MARKS, a/k/a “AJ,”** knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, a firearm, to wit: a Glock model 48 9x19 caliber pistol, an Anderson Manufacturing model AM-15 350 LEGEND caliber rifle, a Ruger model RUGER-57 5.7x28mm pistol, a Rock Island Armory model M19110A1 FS .45 caliber pistol, a Masterpiece Arms model MPA 930DMG 9mm caliber pistol, and a American Tactical model Omni Hybrid multi-caliber pistol.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT NINE

(Possession of a Machinegun—18 U.S.C. § 922(o))

THE GRAND JURY FURTHER CHARGES:

15. On or about June 22, 2023, in the Middle District of Tennessee, **[1] ARNOLD JUNIOR MARKS, a/k/a “AJ,”** did knowingly possess and transfer a machinegun, to wit: a Glock switch, which is a combination of parts designed and intended for use in converting a weapon into a machinegun, and is, therefore, a machinegun as defined in 26 U.S.C. § 5845(b).

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT TEN

(Possession of an Unregistered Firearm Governed by the National Firearms Act—26 U.S.C. § 5861(d))

THE GRAND JURY FURTHER CHARGES:

16. On or about June 22, 2023, in the Middle District of Tennessee, **[1] ARNOLD JUNIOR MARKS, a/k/a “AJ,”** knowingly received and possessed a firearm that was not registered to him in the National Firearms Registration and Transfer Record, to wit: a Glock switch, which is a combination of parts designed and intended for use in converting a weapon into a machinegun, and is, therefore, a machinegun as defined in 26 U.S.C. § 5845(b).

In violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

COUNT ELEVEN

(Possession of a Firearm By a Previously Convicted Felon —18 U.S.C. § 922(g)(1))

THE GRAND JURY FURTHER CHARGES:

17. On or about July 7, 2023, in the Middle District of Tennessee, **[1] ARNOLD JUNIOR MARKS, a/k/a “AJ,”** knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, a firearm, to wit: a Walther model P22 .22 LR caliber pistol, a Smith & Wesson model 642-2 “Lady Smith” .38 S&W SPL +P caliber revolver, a Glock model 26 Gen4 9x19mm pistol, and a Glock model 48 9x19mm pistol.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT TWELVE

(Possession of a Firearm By a Previously Convicted Felon —18 U.S.C. § 922(g)(1))

THE GRAND JURY FURTHER CHARGES:

18. On or about July 10, 2023, in the Middle District of Tennessee, **[1] ARNOLD JUNIOR MARKS, a/k/a “AJ,”** knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, a firearm, to wit: a Zastava model ZPAP92 7.62x39mm pistol, a Spikes Tactical model ST-15 5.56 caliber rifle, a FN Herstal model Five-seven 5.7x28mm pistol, a HS Produkt Springfield Arms model XD-40 SUBCOMPACT .40 caliber pistol, and a Kimber model Stainless II .45 caliber pistol.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT THIRTEEN

(Possession of a Firearm By a Previously Convicted Felon —18 U.S.C. § 922(g)(1))

THE GRAND JURY FURTHER CHARGES:

19. On or about August 9, 2023, in the Middle District of Tennessee, **[1] ARNOLD JUNIOR MARKS, a/k/a “AJ,”** knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, a firearm, to wit: a Smith & Wesson model Airweight .38 S&W SPL +P revolver, a Taurus model PT140 G2 Millennium .40 caliber pistol, a Springfield Armory HS Produkt model XDM Elite 9x19mm caliber pistol, a Glock GMBH model 30 .45 caliber pistol, a Glock model 19X 9x19mm caliber pistol, a Romarm/Cugir model Micro Draco 7.62x39mm caliber pistol, a Zastava Arms model MDL ZPAP92 7.62x39mm pistol, and a American Tactical model Omni Hybrid 5.56 caliber pistol.

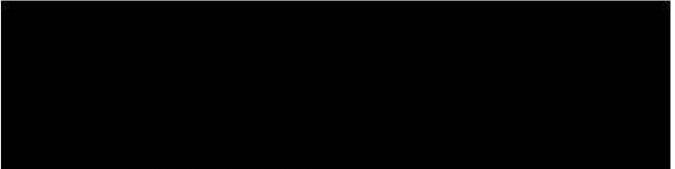
In violation of Title 18, United States Code, Sections 922(g)(1) and 924.

FORFEITURE ALLEGATION

20. The allegations contained in this Indictment are re-alleged and incorporated by reference as if fully set forth in support of this forfeiture.

21. Upon conviction of any one of the Counts of the Indictment, [1] ARNOLD JUNIOR MARKS, a/k/a "AJ," [2] KAMAL FAKHRY, [3] CASSETTY CARVER, and [4] MYKYTA STRUKOV shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) by Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in a knowing violation of a Title 18 or Title 26 offense as alleged in this Indictment.

A TRUE BILL



FOREPERSON

HENRY C. LEVENTIS
UNITED STATES ATTORNEY



JOSHUA A. KURTZMAN
ASSISTANT UNITED STATES ATTORNEY

CRIMINAL COVER SHEET
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Indictment
 Complaint
 Information
 Felony
 Misdemeanor
 Juvenile

County of Offense: Davidson
 AUSA's NAME: Josh Kurtzman
 Reviewed by AUSA: JK
 (Initials)

Arnold Junior Marks
 Defendant's Full Name

Defendant's Address

Interpreter Needed? Yes X No

If Yes, what language? _____

Defendant's Attorney

COUNT(S)	TITLE/SECTION	OFFENSE CHARGED	MAX. PRISON (plus any mandatory minimum)	MAX. FINE
I	18 U.S.C. § 933	Weapons Trafficking	15 years*	\$250,000
II	18 U.S.C. § 371	Conspiracy to Commit Title 18 Offenses	5 years	\$250,000
III	18 U.S.C. § 922(g)(1)	Previously convicted felon in possession of a firearm or ammunition*	15 years*	\$250,000
IV	18 U.S.C. § 922(g)(1)	Previously convicted felon in possession of a firearm or ammunition*	15 years*	\$250,000
V	18 U.S.C. § 922(g)(1)	Previously convicted felon in possession of a firearm or ammunition*	15 years*	\$250,000
VI	18 U.S.C. § 922(g)(1)	Previously convicted felon in possession of a firearm or ammunition*	15 years*	\$250,000
VII	18 U.S.C. § 922(g)(1)	Previously convicted felon in possession of a firearm or ammunition*	15 years*	\$250,000
VIII	18 U.S.C. § 922(g)(1)	Previously convicted felon in possession of a firearm or ammunition*	15 years*	\$250,000
IX	18 U.S.C. § 922(o)	Possession of a machine gun	10 years	\$250,000
X	26 U.S.C. § 5861(d)	Possession of an Unregistered Firearm Governed by the National Firearms Act	10 years	\$250,000
XI	18 U.S.C. § 922(g)(1)	Previously convicted felon in possession of a firearm or ammunition*	15 years*	\$250,000
XII	18 U.S.C. § 922(g)(1)	Previously convicted felon in possession of a firearm or ammunition*	15 years*	\$250,000
XIII	18 U.S.C. § 922(g)(1)	Previously convicted felon in possession of a firearm or ammunition*	15 years*	\$250,000

*If the defendant is found to be an Armed Career Criminal, pursuant to 18 U.S.C. § 924(e), defendant will be subject to a term of imprisonment of between 15 years to life.

Is the defendant currently in custody? Yes () No (X) If yes, State or Federal? Writ requested (N/A)

Has a complaint been filed? Yes No
If Yes: Name of the Magistrate Judge _____
Was the defendant arrested on the complaint? Yes No
Case No.: _____

Has a search warrant been issued? Yes No
If Yes: Name of the Magistrate Judge _____
Case No.: _____

Was bond set by Magistrate/District Judge? Yes No
(X) Amount of bond: _____

Is this a Rule 20? Yes No To/from what district?
Is this a Rule 40? Yes No To/from what district?

Estimated trial time: _____ 3 Days _____

The Clerk will issue a Summons Warrant (circle one) (Note: If information, request for a warrant requires presentation of a sworn affidavit of probable cause to a judicial officer, who will determine whether to issue a warrant)

Detention requested: Yes No Recommended conditions of release: _____

CRIMINAL COVER SHEET
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Indictment
 Complaint
 Information
 Felony
 Misdemeanor
 Juvenile

County of Offense: Davidson
 AUSA's NAME: Josh Kurtzman
 Reviewed by AUSA: JK
 (Initials)

Kamal Fakhry
 Defendant's Full Name

Defendant's Address

Interpreter Needed? Yes X No

If Yes, what language? _____

Defendant's Attorney

COUNT(S)	TITLE/SECTION	OFFENSE CHARGED	MAX. PRISON (plus any mandatory minimum)	MAX. FINE
I	18 U.S.C. § 933	Weapons Trafficking	15 years*	\$250,000
II	18 U.S.C. § 371	Conspiracy to Commit Title 18 Offenses	5 years	\$250,000

*If the defendant is found to be an Armed Career Criminal, pursuant to 18 U.S.C. § 924(e), defendant will be subject to a term of imprisonment of between 15 years to life.

Is the defendant currently in custody? Yes No If yes, State or Federal? Writ requested (N/A)

Has a complaint been filed? Yes No Case No.: _____
 If Yes: Name of the Magistrate Judge _____
 Was the defendant arrested on the complaint? Yes No

Has a search warrant been issued? Yes No Case No.: _____
 If Yes: Name of the Magistrate Judge _____

Was bond set by Magistrate/District Judge? Yes No Amount of bond: _____

Is this a Rule 20? Yes No To/from what district?
 Is this a Rule 40? Yes No To/from what district?

Estimated trial time: 3 Days

The Clerk will issue a Summons/Warrant (circle one) (Note: If information, request for a warrant requires presentation of a sworn affidavit of probable cause to a judicial officer, who will determine whether to issue a warrant)

Detention requested: Yes No Recommended conditions of release: _____

CRIMINAL COVER SHEET
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Indictment
 Complaint
 Information
 Felony
 Misdemeanor
 Juvenile

County of Offense: Davidson
 AUSA's NAME: Josh Kurtzman
 Reviewed by AUSA: JK
 (Initials)

Cassetty Carver
 Defendant's Full Name

Defendant's Address _____

Interpreter Needed? Yes X No

If Yes, what language? _____

Defendant's Attorney _____

COUNT(S)	TITLE/SECTION	OFFENSE CHARGED	MAX. PRISON (plus any mandatory minimum)	MAX. FINE
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Has a complaint been filed? Yes No If Yes: Name of the Magistrate Judge _____ Case No.: _____
 Was the defendant arrested on the complaint? Yes No

Has a search warrant been issued? Yes No If Yes: Name of the Magistrate Judge _____ Case No.: _____

Was bond set by Magistrate/District Judge? Yes No Amount of bond: _____

Is this a Rule 20? Yes No To/from what district?
 Is this a Rule 40? Yes No To/from what district?

Estimated trial time: 3 Days

The Clerk will issue a Summons/Warrant (circle one) (Note: If information, request for a warrant requires presentation of a sworn affidavit of probable cause to a judicial officer, who will determine whether to issue a warrant)

Detention requested: Yes No Recommended conditions of release: _____

CRIMINAL COVER SHEET
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Indictment
 Complaint
 Information
 Felony
 Misdemeanor
 Juvenile

County of Offense: Davidson
 AUSA's NAME: Josh Kurtzman
 Reviewed by AUSA: JK
 (Initials)

Mykyta Strukov
 Defendant's Full Name

Defendant's Address _____

Interpreter Needed? Yes X No

If Yes, what language? _____

Defendant's Attorney _____

COUNT(S)	TITLE/SECTION	OFFENSE CHARGED	MAX. PRISON (plus any mandatory minimum)	MAX. FINE
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Is this a Rule 20? Yes No To/from what district?
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Detention requested: Yes No Recommended conditions of release: _____